

N THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

<b>MELODY JOY CANTU and</b>	§
<b>DR. RODRIGO CANTU,</b>	§
<i>Plaintiffs</i>	§
	§
	§ CASE NO.: 5:20-CV-00746-JKP (HJB)
	§
V.	§
	§
<b>DR. SANDRA GUERRA and</b>	§
<b>DIGITAL FORENSICS</b>	§
<b>CORPORATION, LLC</b>	§
<i>Defendants</i>	§

**NOTICE OF INTENT TO TAKE THE ORAL AND VIDEOTAPED  
DEPOSITION OF MELODY JOY CANTU**

TO: **MELODY JOY CANTU**, by and through her counsel of record, Tor Ekeland, *Pro Hac Vice*, Email: [tor@torekeland.com](mailto:tor@torekeland.com), Michael Hassard, Email: [hassard.mike@gmail.com](mailto:hassard.mike@gmail.com), TOR EKELAND LAW, PLLC, 30 Wall Street, 8th Floor, New York, NY 10005, and Rain Levy Minns, Email: [rain@rainminnslaw.com](mailto:rain@rainminnslaw.com), MINNS LAW FIRM, P.C., D/B/A RAIN MINNS LAW FIRM, 4412 Spicewood Springs Rd., Suite 500, Austin, Texas 78759-8583.

Please take notice that pursuant to Federal Rule of Civil Procedure 30 and the Scheduling Order [Doc. 70] regarding the discovery period (as extended by agreement of the parties), Defendant, Dr. Sandra Guerra, intends to take the oral and/or videotaped deposition of Plaintiff, **MELODY JOY CANTU**, before a notary public or some other officer authorized by law to administer oaths, at **9:00 a.m. on Saturday, July 16, 2022**, by remote means via a videoconferencing platform.

The deposition, when taken, may continue from day to day until completed, and will be taken by stenographic means and videoconferencing examination with the answers to be used in the final trial of the above-styled and numbered cause. You are invited to have counsel present for purposes of cross-examination.

Respectfully submitted,

DAVIS, CEDILLO & MENDOZA, INC.  
755 E. Mulberry, Suite 250  
San Antonio, Texas 78212  
Telephone: (210) 822-6666  
Telecopier: (210) 660-3795

By: /s/ Brandy C. Peery  
RICARDO G. CEDILLO  
Texas State Bar No. 04043600  
[rcedillo@lawdcm.com](mailto:rcedillo@lawdcm.com)  
BRANDY C. PEERY  
Texas State Bar No. 24057666  
[bpeery@lawdcm.com](mailto:bpeery@lawdcm.com)

**ATTORNEYS FOR DEFENDANT,  
DR. SANDRA GUERRA**

**CERTIFICATE OF SERVICE**

I certify that on this 9<sup>th</sup> day of June 2022, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/Brandy C. Peery